Remarks

Rejections of Claims 1-26 and 31 Under 35 U.S.C. § 102(e)

The Examiner has rejected claims 1-26 and 31 as anticipated under 35 U.S.C. § 102(e) by U.S. patent number 6,307,978 issued to Metaxas (hereinafter referred to as Metaxas). The Applicant does not admit that Metaxas is indeed prior art with respect to the subject application and reserves the option to antedate the reference. Support for the amendments to the claims can be found in Figure 5, Figure 6, and paragraph 0023 and elsewhere in the originally filed application. The Applicants respectfully request careful consideration of the following explanations regarding the rejections of claims 1-26 and 31.

Rejection of Claims 1-8 Under 35 U.S.C. § 102(e)

The amended claim 1 includes the limitations of *"partitioning* a group of pixels, corresponding to a group of values, *into a first plurality of columns* including the pixels forming the group of pixels, *with individual of the first plurality of columns including a second plurality of columns* and with each of the ones of the first plurality of columns including a plurality of rows of the pixels". (emphasis added) Column 2, lines 23-39 of Metaxas discloses:

> The system includes an input for receiving an input matrix representative of image data, and a plurality of processors. The plurality of processors processes the input matrix, and each of the processors is in communication with at least a portion of the input matrix. At least one processor processes a portion of the input matrix defined at least in part by a substantially diagonal edge within the image matrix. An output may also be provided in communication with each of the processors, and the output provides an output matrix representative of dithered image data.
>
> *In various embodiments of the invention, the input matrix is divided into diagonal input areas having a row width of at least three picture elements.* Each processor in a linear array of processors processes a diagonal input area. In other embodiments, a matrix of processors may be used to process the input matrix, and the input matrix may be preprocessed prior to being divided

into input areas. (emphasis added)

The Applicant located disclosure elsewhere within Metaxas indicating that the "input matrix" is "divided into diagonal input areas". Please see, for example, in Metaxas, column 3, lines 57-59, column 4, lines 2-4, column 4, lines 48-51, Figure 4, and Figure 5. The Applicant could not locate subject matter in Metaxas upon which the limitations of the amended claim 1 read.

Additionally, Figure 3 does not appear to disclose subject matter upon which the limitations of "partitioning a group of pixels, corresponding to a group of values, into a first plurality of columns including the pixels forming the group of pixels, with individual of the first plurality of columns including a second plurality of columns and with each of the ones of the first plurality of columns including a plurality of rows of the pixels" read. That is, Figure 3 does not appear to disclose that something upon which "a first plurality of colums" "with individual of the first plurality of columns including a second plurality of columns" reads.

As the Applicant knows that the Examiner is well aware from MPEP 2131, "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference" and "[t]he elements must be arranged as required by the claim". The Applicant respectfully submits that for at least the reason that "each and every element as set forth in the claim is" not "found, either expressly or inherently described" in the referenced sections of Metaxas, a valid prima facie anticipatory rejection of the amended claim 1 with respect to Metaxas is not present. Accordingly, the Applicant respectfully requests withdrawal of the rejection of claim 1 as anticipated under 35 U.S.C. § 102(e) by Metaxas.

Because each of claims 2-8 is dependent, either directly or indirectly, upon the amended claim 1, they incorporate all of the limitations of the amended claim 1. Therefore claims 2-8 are not anticipated by Metaxas for at least this reason. Accordingly, the Applicant respectfully requests withdrawal of the rejection of claims 2-8 as anticipated under 35 U.S.C. § 102(e) by Metaxas.

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Rejections of Claims 9-26 Under 35 U.S.C. § 102(e)

The amended claim 9 includes the limitations of "a first processing device to perform halftoning on a first set of values corresponding to a first set of pixels forming a first column, *including a first plurality of columns, with the first column included in a second plurality of columns formed from partitioning a group of pixels forming an image*". (emphasis added) Similar to the explanation provided with respect to the rejection of claim 1, the Applicant respectfully submits that for at least the reason that "each and every element as set forth in the claim is" not "found, either expressly or inherently described" in the referenced sections of Metaxas, a valid prima facie anticipatory rejection of the amended claim 9 with respect to Metaxas is not present. Accordingly, the Applicant respectfully requests withdrawal of the rejection of claim 9 as anticipated under 35 U.S.C. § 102(e) by Metaxas.

Because each of claims 10-26 is dependent, either directly or indirectly, upon the amended claim 9, they incorporate all of the limitations of the amended claim 9. Therefore claims 10-26 are not anticipated by Metaxas for at least this reason. Accordingly, the Applicant respectfully requests withdrawal of the rejection of claims 10-26 as anticipated under 35 U.S.C. § 102(e) by Metaxas.

Rejection of Claim 31 Under 35 U.S.C. § 102(e)

The amended claim 31 includes the limitations of "with the *first column included as a first one of a plurality of columns formed from partitioning* the group of pixels" and "with the *second column included as a second one of the plurality of columns*". (emphasis added) Similar to the explanation provided with respect to the rejection of claim 1, the Applicant respectfully submits that for at least the reason that "each and every element as set forth in the claim is" not "found, either expressly or inherently described" in the referenced sections of Metaxas, a valid prima facie anticipatory rejection of the amended claim 31 with respect to Metaxas is not present. Accordingly, the Applicant respectfully requests withdrawal of the rejection of claim 31 as anticipated under 35 U.S.C. § 102(e) by Metaxas.

Rejections of Claims 27-28 Under 35 U.S.C. § 103(a)

The Examiner has rejected claims 27 and 28 as obvious under 35 U.S.C. § 103(a) over Metaxas in view of United States patent number 6,870,642 issued to Ostromoukhov, hereinafter referred to as Ostromoukhov. The Applicants respectfully request careful consideration of the following explanations regarding the rejections of claims 27-28.

The amended claim 27 recites the limitations of "with *the first column included* as *a first one of a plurality of columns formed from partitioning* the pixels forming the image into the plurality of columns" and "with *the second column included as a second one of the plurality of columns*". (emphasis added)

Similar to the explanation provided with respect to the amended claim 1, the Applicant respectfully submits that the referenced sections of Metaxas do not disclose subject matter upon which the limitations of claim 27 recited above read. The sections of Ostromoukhov cited by the Examiner do not appear to provide these missing limitations.

As the Applicant knows the Examiner is well aware, according to MPEP 2143, one element that must be met to make a valid prima facie obviousness rejection is that "the prior art reference (or references when combined) must teach or *suggest all the claim limitations*." (emphasis added) Because the sections of Ostromoukhov and Metaxas relied upon by the Examiner in making the rejection of claim 27 do not disclose subject matter upon which all the limitations of the amended claim 27 read, the Applicant submits that a valid prima facie obviousness rejection of the amended claim 27 is not present for at least this reason. Accordingly, the Applicant respectfully requests withdrawal of the rejection of the amended claim 27 under 35 U.S.C. § 103(a).

Claim 28 is dependent upon claim 27 and therefore includes all the limitations of claim 27. Because, the Applicant submits, claim 27 is nonobvious, claim 28 is nonobvious for at least the reason that claim 28 is dependent upon claim 27. Accordingly, the Applicant respectfully requests withdrawal of the

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rejection of claim 28 under 35 U.S.C. § 103(a).
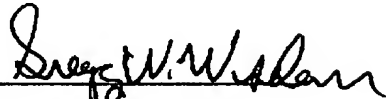
Allowed Subject Matter

Claims 29 and 30 have been allowed by the Examiner.

Conclusion

The Applicant respectfully submits that the subject application is in a condition for allowance. Allowance is respectfully requested.

Respectfully submitted,
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